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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of

Amendment of Section 73.202(b) )  
Table of Allotments ) MB Docket No. 04-426  
FM Broadcast Stations ) RM - 11125  
(Beaumont and Mont Belvieu, Texas) )

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JAN 31 2005

To: Office of the Secretary  
Attn: Assistant Chief, Audio Division  
Media Bureau

Federal Communications Commission  
Office of Secretary

COMMENTS

Cumulus Licensing LLC ("Petitioner"), by its counsel and pursuant to Section 1.415 of the Commission's Rules, hereby submits its Comments in the above captioned proceeding. *See Notice of Proposed Rule Making, ("NPRM")* DA 04-3806 (released December 10, 2004). In response to the petition, the NPRM proposes the reallocation of Channel 248C from Beaumont to Mont Belvieu as that community's first local aural transmission service, and the modification of Station KRWP(FM) license accordingly. The proposed reallocation will not deprive Beaumont of local service because ten local transmission services will remain licensed to the community.

Even though this reallocation can be accomplished with no change to the physical facilities of KRWP(FM), it will further the public interest by providing a first local service under Priority Three of the Commission allotment priorities. This is consistent with previous reallocations routinely granted by the Commission. *See, e.g. Salem and Molalla, Oregon*, 16 FCC Rcd 140901 (2001).

The Petitioner hereby reaffirms its interest in providing a first local aural transmission service to Mont Belvieu as stated in the petition. If the petition is granted, Petitioner will file an application for Channel 248C at Mont Belvieu, and will construct the facilities if its application is granted.

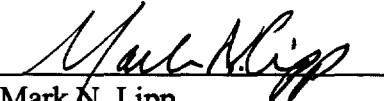
File of Order rec'd  
LBN:AB/DE

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Accordingly, Cumulus Licensing LLC urges the Commission to grant the petition.

Respectfully submitted,

CUMULUS LICENSING LLC

By:   
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Its Counsel

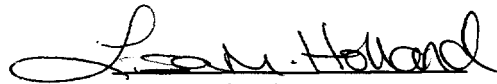
January 31, 2005

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**CERTIFICATE OF SERVICE**

I, Lisa Hollan, in the law firm of Vinson & Elkins, L.L.P., do hereby certify that I have on this 31st day of January, 2004, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Comments**" to the following:

- \* Ms. Victoria M. McCauley  
Media Bureau  
Federal Communications Commission  
445 12th Street, SW. Room 2-C222  
Washington, D.C. 20554

  
Lisa Holland

\*Hand Delivered